

Northern Lincolnshire and Goole NHS Trust

Modern Slavery Statement
1 April 2023 to 31 March 2024

1. Introduction

The Modern Slavery Act 2015 requires organisations to publish an annual Modern Slavery Statement on their website within six months of the end of the financial year (i.e., for the Trust this would require the statement to be published by 30 September).

With reports¹ of modern slavery victims increasing year on year and an estimate of more than 130,000 people being trapped in modern slavery, costing the UK £33 billion per year, it is imperative that the Trust continues to be committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

This statement sets out the steps that the Trust has taken over the financial year 1 April 2023 to 31 March 2024 to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains and covers the following:

- Organisational structure and business
- Policies in relation to slavery and human trafficking
- Due diligence and managing risks in the Trust's business and supply chains
- Training and performance indicators

2. Organisational Structure and Business

Northern Lincolnshire and Goole NHS Foundation Trust (NLaG) provides services across North Lincolnshire, North East Lincolnshire, East Riding of Yorkshire and West and East Lindsey. The Trust's total turnover for 2023 / 2024 was £574,190,000. The Trust employs over 7600 permanent and fixed term contracted staff (ESR April 2024).

Further details regarding the Trust's business and structure can be found in the Annual Report and Accounts 2022/23, available on the Trust website [Annual reports and accounts - Northern Lincolnshire and Goole NHS Foundation Trust \(nlg.nhs.uk\)](https://www.nlg.nhs.uk/annual-reports-and-accounts)

- Note the NLaG Annual Report 2023/2024 is not currently available.

¹ <https://www.antislavery.org/slavery-today/slavery-uk/>

3. Policies in Relation to Slavery and Human Trafficking

The Trust has several policies to support staff in relation to modern slavery, including:

- Freedom to Speak Up Policy for the NHS (DCP 126).
- Bullying and Harassment Policy and Procedure ((DCP004).
- Staff Exposed to Domestic Abuse Guidance (DCM 275).
- Managing Relationships at Work Policy (DCP 413).

The Trust publishes a broad range of safeguarding policies and factsheets, for both service users and staff, which include:

- Safeguarding Adults Policy and Guidance (DCP 017)
- Safeguarding Children Policy (DCP 064)

Any new campaigns/policies in relation to modern slavery are published on the Trust intranet.

All Trust policies go through a robust consultation and ratification process and are available on the Trust's internal website.

3. Due Diligence Processes in the Trust's Business and Supply Chains

3.1 *Due Diligence in Business*

The Trust is committed to preventing slavery and human trafficking in corporate activities and ensuring that workers are not exploited, that they are safe and that relevant employment (working hours etc.), health and safety, human rights laws and international standards are adhered to.

To support staff, the following steps are taken:

- All staff are employed on employment contracts which comply with UK law.
- Pre-employment checks are undertaken on all workers directly and non-directly employed by the Trust (e.g., employees, agency staff, contractors, volunteers, students, and trainees on work experience etc.).
- All staff undertake mandatory safeguarding training, which covers modern slavery.
- As an equal opportunities' employer the Trust is committed to creating an inclusive working environment for all staff, which enables staff to feel confident that they can raise concerns without any risk to themselves via several avenues, including a Freedom to Speak up Guardian.
- A comprehensive range of modern slavery and safeguarding information for service users and staff is available for staff on the Trust intranet.
- All active agencies who supply staff to the Trust are asked to provide assurance that they are compliant with the Modern Slavery Act 2015 on an annual basis.
- Modern slavery is a term used that includes any form of human trafficking, slavery, servitude or forced labour, as set out in the Modern Slavery Act 2015.
- Modern slavery is widespread and can go unnoticed in our daily lives. Victims may face physical violence or coercion and may be forced into overwhelming debt. Additionally, they may have their passports taken away and be threatened with deportation. To safeguard against this, the Trust is constantly

seeking ways to support and protect staff and service users from modern slavery and human trafficking. Some of the steps taken to achieve this include:

- Participation in the Humber Modern Slavery Partnership (HMSP) Strategic Board, a network of over 60 organizations in the Humber region dedicated to preventing and combating modern slavery.
- Participation in the North East Lincolnshire Modern Slavery Partnership, a local network aimed at raising awareness of modern slavery.
- Incorporating modern slavery into mandatory safeguarding adults training.
- Sharing knowledge and information, including providing access to training across the Trust through the intranet.
- Monitoring the number of concerns raised to the Trust safeguarding adults' team regarding exploitation and/or modern slavery. While these numbers are low, they show that staff understand this aspect of safeguarding.
- Collaborating with individuals to ensure that the principles of Making Safeguarding Personal are followed. Support and referrals should be consent-based and involve the person's input.
- Professionals should also consider child trafficking and the possibility of the child or young person being used in different forms of exploitation such as child sexual exploitation, fraud, forced marriage, criminal activity such as pick pocketing, cannabis cultivation or domestic servitude. The consequences of such involvement can have both short and long term consequences for the child, including guilt and confusion.
- The safeguarding children team raise awareness of the issue of modern slavery, child criminal exploitation (CCE) and child sexual exploitation (CSE) in their safeguarding children training.
- The safeguarding children team are active members at Multi Agency Child Exploitation (MACE) meetings and at National Referral Mechanism (NRM) meetings following completion of safeguarding referrals to Police and Children Social Care.

3.2 *Due Diligence in Supply Chains*

The Trust typically contracts with suppliers through relevant procurement frameworks where the award of a place on the framework will have required the supplier to confirm compliance with the Act as part of the process (amongst a range of other criteria). Where the Trust uses an 'Open' tender process in line with the Public Contracts Regulations 2015 then questions in relation to compliance with the Modern Slavery Act appear as mandatory questions in the pre-selection process. Contracts that sit outside of these examples will typically fall way below the annual turnover threshold, although the Trust would still expect business to be carried out in line with the provisions of the Act.

The Trust will continue to update records on the remaining suppliers as and when contracts are renewed.

- The Trust does not conduct business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. Steps taken to reduce the risk of modern slavery occurring within the supply chain include:

- Use NHS Terms and Conditions for Goods and Services for specification and tender documents which require suppliers to comply with all relevant legislation and guidance, including modern slavery conditions.
- Continue to ensure there are robust processes in place to mitigate risks associated with procuring goods and services outside of the tendering process, including:
 - All goods purchased outside the tendering process must adhere to the Trust's Standing Financial Instructions and are subject to the Purchase Order Version of the Terms and Conditions for both goods and services (January 2018) which references modern slavery.
 - All purchases where the expenditure is over £10,000 and less than £50,000 must have three official quotations.
 - When requesting information for values lower than the £10,000 referenced in the Standing Financial Instructions, suppliers are requested to complete the Trust's formal quotation form, which includes reference to modern slavery.

4. Training and Performance Indicators

Compliance with the Trust's modern slavery agenda is measured by reviewing the number of staff who have completed the following mandatory courses/eLearning packages (which include modern slavery):

- Safeguarding Adults
- Safeguarding Children

As of June 2024, 90% of Trust staff are compliant with the required safeguarding training.

The Safeguarding training and advice:

- Modern Slavery is included with the safeguarding adults and children training.
- The safeguarding adults and children's teams are available Monday / Friday 9.00 – 5.00pm to offer advice, support, and information to staff if they have concerns about identification of modern slavery and how to make appropriate referrals to safeguard adults and children.
- Gaining Respect and Finding Trust team in children social care deliver bespoke training to wards and departments within the Trust which covers modern slavery, child criminal exploitation and child sexual exploitation.

5. Summary

The Trust continues to be committed to preventing modern slavery and human trafficking in any part of its business or supply chains. The Trust is committed to:

- Continuing to educate staff on the importance of preventing modern slavery and to meet the obligations under the national modern slavery agenda.
- Monitoring and reviewing ongoing modern slavery legislation and best practice.
- Obtaining assurances from main suppliers/agencies etc. that they comply with the Modern Slavery Act 2015 and record and monitor these as required.
- Reviewing Trust policies and including references to modern slavery where appropriate.

Trust Board has considered and approved this statement and will continue to support the requirements of the legislation.

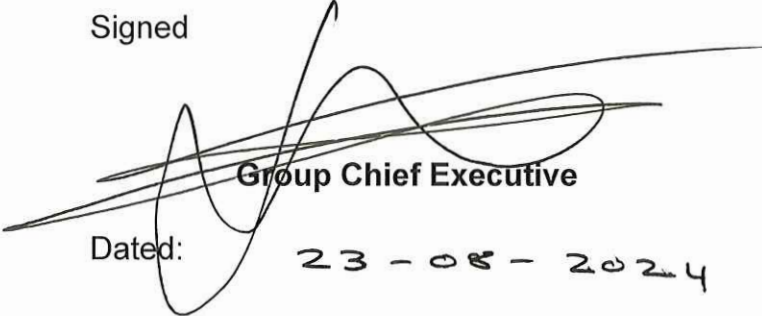
Signed



Group Chairman

Dated: 27 August 2024

Signed



Group Chief Executive

Dated: 23 - 08 - 2024

